

EXHIBIT 80

Jonathan Francis

From: Ray, Wendy J. <WRay@mofo.com>
Sent: Friday, November 17, 2017 8:08 AM
To: James Judah; QE-Waymo; John Cooper; Matthew Cate
Cc: UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; Uber-sg@LISTS.SUSMANGODFREY.COM
Subject: RE: Waymo - receipts

James,

MoFo received the March 1, 2016 receipt in late April during the time when Uber was responding to multiple expedited depositions and document requests and moving to compel arbitration. The receipt was placed in Ms. Morgan's witness file. In October, Ms. Morgan testified that she had provided a receipt to legal counsel. Waymo never asked for the receipt. Please let us know why Waymo did not ask for the receipt at or after Ms. Morgan's deposition.

When Ms. Morgan provided three additional receipts yesterday, one of our team members referenced Ms. Morgan's October deposition testimony about a receipt provided to counsel. We looked for and found the receipt, determined that it did not appear to have been produced, and thus produced it today, along with the three receipts that we received yesterday. As I mentioned, we do not object to a 30 minute deposition about the receipts.

Wendy

From: James Judah [mailto:jamesjudah@quinnemanuel.com]
Sent: Thursday, November 16, 2017 7:04 PM
To: Ray, Wendy J.; QE-Waymo; John Cooper; Matthew Cate
Cc: UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; Uber-sg@LISTS.SUSMANGODFREY.COM
Subject: RE: Waymo - receipts

- External Email -

Wendy and John –

We are reviewing Uber's untimely production, but in the meantime we have a few questions:

- 1) Which receipt did Ms. Morgan provide to Uber's counsel prior to her October 4 deposition?
- 2) When did Ms. Morgan provide that receipt to Uber's counsel?
- 3) Why didn't Uber produce that receipt before the close of fact discovery, before Ms. Morgan's August 18 deposition, before Ms. Morgan's October 4 deposition, or at any time prior to today?
- 4) When did Ms. Morgan find that receipt?
- 5) When did Ms. Morgan find the other receipts that were produced today?

Please provide responses by 9 AM tomorrow. John, we request a meet and confer tomorrow morning to the extent any of these questions are not answered by 9 AM.

Waymo reserves all rights.

Best,
James

From: Ray, Wendy J. [<mailto:WRay@mofo.com>]
Sent: Thursday, November 16, 2017 1:36 PM
To: QE-Waymo <qewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; BSF_EXTERNAL_UberWaymoLit <BSF_EXTERNAL_UberWaymoLit@BSFLLP.com>; Uber-sg@LISTS.SUSMANGODFREY.COM
Subject: Waymo - receipts

Counsel,

Rhian Morgan found hard copies of receipts from ShredWorks at her house while looking for something else, and gave them to counsel for Uber yesterday. We are processing them for production to you today. In deposition, she testified that she provided a receipt to counsel. We are producing that receipt as well. We understand you may have questions about the receipts and would not object if you would like to reopen her deposition for 30 minutes, limited to questions about these receipts.

Wendy J. Ray

Partner | Morrison & Foerster LLP
707 Wilshire Boulevard | Los Angeles, CA 90017-3543
P: +1 (213) 892-5446
mofo.com | [LinkedIn](#) | [Twitter](#)

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